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7 Attorneys for Defendant  
*Albertson's LLC*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 DANITA DAILEY-ADAMS, individually,

12 Plaintiffs,

13 vs.

14 ALBERTSON'S LLC; DOES I through X;  
15 inclusive; ROE BUSINESS ENTITIES I  
through X, inclusive,

16 Defendants.

**Case No. 2:17-cv-02602-GMN-GWF**

**STIPULATION AND ORDER TO**  
**EXTEND DISCOVERY DEADLINES**  
**(FIRST REQUEST)**

17  
18 In accordance with Local Rules of Practice for the United States District Court for the  
19 District of Nevada ("LR") 26-4, Defendant Albertson's LLC ("Defendant"), by and through its  
20 counsel of record, BACKUS, CARRANZA & BURDEN, and Plaintiff Danita Dailey-Adams  
21 ("Plaintiff"), by and through her counsel of record, BERTOLDO BAKER CARTER & SMITH, hereby  
22 stipulate and agree to an extension of all remaining discovery deadlines by ninety (90) days. The  
23 parties propose the following revised discovery plan:

24 **DISCOVERY COMPLETED TO DATE**

25 The parties conducted an Initial Disclosure Conference pursuant to LR 26-1 and Fed. R.

1 Civ. P. 26(f) on November 28, 2017. In December 2017, the parties served their initial  
 2 disclosure of documents and the names of individuals with knowledge of the facts pertaining to  
 3 the claims set forth in this matter pursuant to Fed. R. Civ. P. 26(a)(1). On February 28, 2018,  
 4 Defendant propounded interrogatories and requests for production of documents upon Plaintiff.  
 5 On March 29, 2018, Plaintiff responded to Defendant's written discovery requests.

#### 6 **DISCOVERY TO BE COMPLETED**

7 The parties will propound additional written discovery. Deposition of Plaintiff,  
 8 representatives of Defendant, and other percipient witnesses remain to be taken. Defendant also  
 9 anticipates deposing Plaintiff's medical providers. The parties are also expected to disclose and  
 10 depose experts.

#### 11 **REASONS FOR EXTENSION TO COMPETE DISCOVERY**

12 A discovery extension is needed in this case because Plaintiff has only recently  
 13 completed her surgery which caused delay to her deposition and the depositions of her treating  
 14 physicians. Thus, the parties respectfully request a ninety (90) day extension of the remaining  
 15 discovery deadlines as detailed below. This request is made in good faith and not for the purpose  
 16 of delay.

#### 17 **PROPOSED NEW DISCOVERY DEADLINES**

##### 18 **Deadline to Amend Pleadings/Add Parties:**

19 Currently: March 27, 2018  
 Proposed: N/A

##### 20 **Interim Status Report:**

21 Currently: April 26, 2018  
 Proposed: July 25, 2018

##### 22 **Initial Expert Disclosure Deadline:**

23 Currently: April 26, 2018  
 Proposed: July 25, 2018

##### 24 **Rebuttal Expert Disclosure Deadline:**

25 Currently: May 28, 2018

**Proposed: August 27, 2018**

**Discovery Deadline:**

Currently: June 25, 2018

**Proposed: September 24, 2018**

**Deadline to File Dispositive Motions:**

Currently: July 25, 2018

**Proposed: October 23, 2018**

**Pre-Trial Order Deadline:**

Currently: August 24, 2018

**Proposed: November 22, 2018**

DATED: April 17, 2018

DATED: April 17, 2018

**BACKUS, CARRANZA & BURDEN**

**BERTOLDO BAKER CARTER & SMITH**

/s/ Jack P. Burden

/s/ Lawrence J. Smith

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Attorney for Plaintiff

Attorneys for Defendant

**ORDER**

IT IS SO ORDERED.

DATED: this 18th day of April 2018



UNITED STATES MAGISTRATE JUDGE